March 11, 2008

Certified Mail No. 7007 0710 0001 2888 0258
Return Receipt Requested

Richard Goodyear, P.E.
Permit Programs Manager
Air Quality Bureau
New Mexico Environment Department
1301 Siler Road, Building B
Santa Fe, NM 87507

Re: Permit No. 325-M-9, Rev.15 - Technical Permit Revision

Dear Mr. Goodyear,

As noted in our February 15, 2008 Technical Permit Revision submittal for the Boiler emission factors, Intel is submitting this additional request to revise Permit No. 325-M-9, Rev. 15 (Permit). This request includes revisions to the emission factors (EFs) for NOx and CO in Table 1 for the thermal oxidizers (RTO), revisions to the emission factors for hazardous air pollutants (HAP) and volatile organic compounds (VOCs) in Tables 3 and Z, revisions to the language in the permit regarding reporting for thermal oxidizer downtimes, scrubber downtimes, and operation of boilers on diesel fuel and revisions of the stack/source designations in Attachment A of the permit.

Emission Factors

Pursuant to Condition 1.G of the Permit, Intel submits the following proposed technical permit revision to change the emission factors (EFs) for NOx and CO in Table 1 for the thermal oxidizers (RTO) and to change the factors for hazardous air pollutants (HAP) and volatile organic compounds (VOCs) in Tables 3 and Z. Table 1 of the Permit contains the EFs used to calculate Intel's twelve-month rolling total NOx, CO and VOC emissions from the combustion of natural gas; Tables 3 and Z contain the HAP and VOC EFs used to calculate Intel's twelve-month rolling total HAP and VOC emissions.

RTO NOx & CO EFs

Intel is requesting that the emission factors for NOx and CO for the Durr RTOs be updated using the hourly maximum emission rates from the past two years of FTIR testing and average natural gas consumption rate from the past two years. Intel is requesting that AP-42 emission factors be used for the Munters RTO until the units have been tested and site specific emission factors can be developed. Enclosure 1 contains the summary operational and testing data used to calculate the proposed emission factors for the Durr RTOs and AP-42 emissions factors for the Munters RTOs.

HAP and VOC EFs

The proposed revision reflects the following changes to the emission factors:

1) Inclusion of the process changes at the site that already have been implemented and those that will be implemented in the future.

2) Inclusion of several chemicals for which chemical-specific factors are not specified in the permit. These chemicals currently have a default emission factor of 1.0 and are either chemicals that were not previously used at Intel, or chemicals that have been used at Intel, but did not have previously established emission factors.

Enclosure 2 provides the detail for changes to the emission factors.

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Reporting of Equipment Downtime
Currently, the permit language references the malfunction, startup and shutdown rule, 20.2.7 NMAC, even though the events covered by the permit do not result in emissions in excess of an applicable emissions limit. As a result of the expected regulatory changes to 20.2.7 NMAC, Intel proposes to revise the permit language to accurately reflect the information that needs to be reported and clarify that that the information is not being reported under 20.2.7 NMAC. Enclosure 3 provides the proposed language.

Stack/Source Designations
As currently written, the stack/source designations are difficult to understand and do not accurately reflect where stacks/sources are located. In addition, Intel is modifying the list to include only those sources that are regulated by NMED. Enclosure 4 provides a proposal for Permit Attachment A.

Pursuant to 20.2.72.219.B.6 NMAC, Intel has provided notice by certified mail to all municipalities, Indian tribes, and counties within a ten-mile radius of the site. Public notice has been submitted for publication and copies will be sent separately. Pursuant to 20.2.75.10.A NMAC, enclosed please find a check in the amount of $500.00 for the permit-filing fee. If you have any questions or need additional information, please contact Sarah Chavez at (505)794-4917.

Sincerely,

Frank Gallegos
NM Site Environmental, Health & Safety Manager

Enclosure 1: RTO Emission Factor Explanation
Enclosure 2: HAPs and VOC Emission Factor Explanation with Updated Emission Factors
Enclosure 3: Proposed language changes for equipment downtime reporting
Enclosure 4: Proposed Attachment A

CERTIFICATION

I, Frank E. Gallegos, Intel Site EHS Manager, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Frank E. Gallegos

STATE OF NEW MEXICO)
)ss.
COUNTY OF SANDOVAL)

Subscribed and sworn before me on this 11 day of March, 2008 by Frank E. Gallegos.

Liza Marquez

OFFICIAL SEAL
LIZA MARQUEZ
Notary Public
State of New Mexico
My Comm. Expires May 20, 2008

[My commission expires: May 20, 2008]